



4. I have personal knowledge of the fact that MF owns Pierre's former Chase account by virtue of my work at MCM and my review of MCM's records applicable to Pierre's debt.

5. Attached hereto as Murphy-Pierre Ex. A and Bates stamped MCM-0992 to MCM-1016, (sealed) is a true and correct copy, with certain redactions to protect proprietary information, of the confidential purchase agreement between Chase and MF by which MF purchased the portfolio of charged-off debts.

6. Pierre's former Chase debt obligation was included in the portfolio of charged-off debts transferred pursuant to Murphy-Pierre Ex. A.

7. The information pertaining to this portfolio of charged-off debts was transferred to MCM in a computerized form through a media file containing the information applicable to each of the charged-off debts.

8. Attached hereto as Murphy-Pierre Ex. B and Bates stamped MCM-0004 is a printed copy of the information provided by Chase pursuant to the Bill of Sale/Assignment of Accounts transferred on or about September 21, 2010, in connection with the sale of accounts from Chase to MF, identifying Pierre's former Chase as one of the purchased debts within the Chase portfolio of accounts sold to MF.

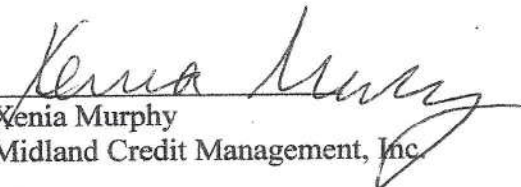
9. Chase provided MF with certain evidence of Pierre's former Chase account, including a series of account statements for Pierre's account from Chase, dated August 3, 2007 through January 3, 2009, true and correct copies of which, redacted to protect Pierre's privacy, are attached hereto as Murphy-Pierre Ex. C and Bates stamped MCM-0010 to MCM-0045. These statements reflect that Plaintiff's Chase account was a Buy.com branded Chase account.

10. Chase also provided MF copies of two sets of terms and conditions that Chase represented governed, at different times, Pierre's former Chase account, attached hereto as Murphy-Pierre Ex. D; one set of terms and conditions that governed Pierre's account is Bates stamped MCM-0047 to MCM-0052; the other is Bates stamped MCM-0053 to MCM-0060.

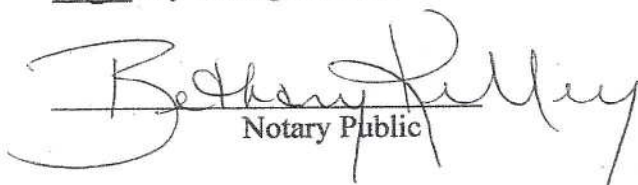
11. After acquiring Pierre's former Chase debt, acting on behalf of MF, MCM sent Pierre an initial collection letter, titled "Notice of New Ownership *And* Pre-Legal Review, on September 26, 2010. A true and correct copy of this letter, with certain redactions for privacy, is attached hereto as Murphy-Pierre Ex. E and Bates stamped MCM-0007 to MCM-0009.

12. Attached hereto as Murphy-Pierre Ex. F and Bates stamped RR#000016 to RR#000019 is a true and correct copy of the Affidavit of Ashley Hoffmann Support of MF's Motion for Default Judgment against Pierre, dated March 9, 2011, and its Certificate of Conformity, supporting MF's efforts to collect Pierre's former Chase account.

Dated: Kent, Rhode Island  
August 30, 2016

  
Xenia Murphy  
Midland Credit Management, Inc.

Sworn to before me this  
30 day of August 2016

  
Notary Public

